

O'Melveny & Myers LLP
1999 Avenue of the Stars
8th Floor
Los Angeles, CA 90067-6035

T: +1 310 553 6700
F: +1 310 246 6779
omm.com

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Daniel M. Petrocelli
D: +1 310 246 6850
dpetrocelli@omm.com

VIA ECF

The Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Thomas J. Barrack
Criminal Docket No. 1:21-CR-371-2 (BMC)

Dear Judge Cogan:

With the consent of the U.S. Attorney's Office, defendant Thomas J. Barrack, Jr., respectfully moves the Court to modify his bond conditions by removing one of the four secured properties from his personal appearance bond. Specifically, Mr. Barrack seeks to release the lien on the property located at 17002 Adlon Road, Encino, California,¹ owned by his adult son, Thomas J. Barrack, III, from the bond so that Mr. Barrack's son may sell his home. Should the Court grant Mr. Barrack's proposed modification, his \$250 million dollar personal appearance bond will remain secured by \$5 million in cash, over 21 million shares in Digital Bridge, the signatures of his adult son, his ex-wife, and his close personal friend, and three other properties. See Docket Entry No. 15. The proposed bond will thus continue to "reasonably assure the appearance of the person as required and the safety of any other person and the community[.]" 18 U.S.C. § 3142(g).

To date, Mr. Barrack has not demonstrated any non-compliance with his required appearances before the Court, and he does not present any danger to any individual or the community. We have conferred with counsel for the government who has agreed to the proposed bond

¹ The bond submitted to the Court describes this property as being located at 11712 Adlon Road, Los Angeles, CA, 91436.

modification, provided that Mr. Barrack's son agree to add his new residence (after it is purchased) to the bond, which Mr. Barrack, III, has agreed to do.

Respectfully submitted,

/s/ Daniel M. Petrocelli

Daniel M. Petrocelli
James A. Bowman
Nicole M. Argentieri
Partners
of O'MELVENY & MYERS LLP